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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

MICHAEL HINDS,

Defendant.

Case: 2:18-cr-20533

Judge: Roberts, Victoria A.

MJ: Majzoub, Mona K.

Filed: 08-02-2018 At 02:49 PM

INDI USA VS HINDS (DP)

VIOLATIONS: 21 U.S.C. § 841(a)(1)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(c)

FORFEITURE: 21 U.S.C. § 853
18 U.S.C. § 924(d)
28 U.S.C. § 2461(c)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

21 U.S.C. § 841(a)(1)

Possession with Intent to Distribute a Controlled Substance – Cocaine Base

On or about November 23, 2017, in the Eastern District of Michigan, Southern Division, the defendant, MICHAEL HINDS, did knowingly and unlawfully possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO

18 U.S.C. § 922(g)(1)
Felon in Possession of a Firearm

On or about November 23, 2017, in the Eastern District of Michigan, Southern Division, the defendant, MICHAEL HINDS, having previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess a firearm, that is: one (1) Crown City Arms, model 1911, .45 caliber pistol, said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

18 U.S.C. § 924(c)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about November 23, 2017, in the Eastern District of Michigan, Southern Division, the defendant MICHAEL HINDS did knowingly and unlawfully possess a firearm, that is one Crown City Arms, model 1911, .45 caliber pistol, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the crime of possession with intent to distribute a controlled substance in Counts One and Two, in violation of Title 18, United States Code, Section 924(c)(1)(A).

FORFEITURE ALLEGATIONS

21 U.S.C. § 853, 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)
Criminal Forfeiture

The above allegations contained in this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c).

Upon conviction of the Title 21 offenses set forth above in this Information, defendant shall forfeit to the United States, pursuant to Title 21 United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

Upon conviction of any of the Title 18 offenses set forth above in this Information, defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in or used in the knowing commission of such offense(s).

If any of the property described above, as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeit other property of defendant up to the value of the above described forfeitable property, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c).

Upon conviction of the Title 21 offenses set forth above in this Information, the Government will seek a forfeiture money judgment against defendant in an amount representing the total amount of proceeds obtained as a result of defendant's Title 21 offenses.

THIS IS A TRUE BILL

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER
United States Attorney

s/ Matthew A. Roth
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Dated: August 2, 2018

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: MSH

Case Title: USA v. Michael Hinds

County where offense occurred : Wayne

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- no prior complaint.

☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 17-mj-30649]

☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

August 2, 2018

Date


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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.